

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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| In the Matter of: |) | |
| Broadcast Localism |) | MB Docket No. 04-233 |
| |) | |

TO: Office of the Secretary
ATTN: The Commission

COMMENTS OF THE ALASKA BROADCASTERS ASSOCIATION

Introduction and Summary

The Alaska Broadcasters Association (“Alaska Broadcasters”) respectfully submits comments in response to the Notice of Inquiry of the Federal Communications Commission (“FCC” or “Commission”) in the above-captioned proceeding, released July 1, 2004, concerning broadcast localism.¹

Localism is alive and well. This is true not only because licensees have a legal obligation to “air programming that is responsive to the interests and needs of their communities of license,”² but localism is alive and well because the market demands it.

What sets local broadcasters apart from other electronic media is that they serve distinct markets and places. Cable or satellite-delivered programming and webcasting can come from anywhere and have no inherent sense of place. But, local broadcasters are, by their very nature, somewhere in particular.

They are active players in the lives of their communities. This is true because a broadcast station’s audience is inherently local, even if all of a station’s programming is

¹ 19 FCC Rcd 12425 (2004).

² *Id.* at ¶1.

not locally-produced. Local audiences can change stations – or move to a different medium or delivery mechanism– if their interests are not served. If a local station is not providing the most relevant programming for its listeners, its programming is no longer distinctive – and its competitive position will be diminished.

In the vast expanse of a less populous state, such as Alaska, many local stations have traditionally provided – and continue to provide – the communications centerpoints for their communities. Whether broadcasting local news, weather, emergency information, local sports, or school lunch menus, their business success depends on serving as the voices of their communities. Local broadcasters have always been committed to this role and are working to expand it.

As non-broadcast competitors aggressively vie for both radio and television audiences, this traditional mission has also become a significant competitive advantage for local broadcasters. Local broadcasters' traditional position at the centerpoint of a community's communications needs now also provides them with an edge in an ever more competitive marketplace.

Television stations have lived with this reality for a generation now in the face of growing competition from mainly national programming carried on channels distributed only via such multichannel video production distributors (MVPDs) as cable and DBS that now serve more than 85 percent of U.S. households. During this period, many local television stations have increased local news blocks and other programming responsive to local needs – not because of any mandates, but because success in the market demands the distinctiveness that broadcast localism brings in the competition for audiences. Localism has always been and will continue to be important to broadcasters.

Localism is a significant public interest. Local free over-the-air broadcasters provide it. The FCC must nourish, support and protect these efforts – not by imposing expensive one-size-fits-all mandates, but by providing a regulatory framework that allows broadcasters to respond to the strong community demand for localism. Broadcasters have been doing this for more than three-quarters of a century, and have every incentive to continue this time-honored tradition because local broadcast audiences respond to it.

Broadcasters Ascertain Community Interests and Needs

Local broadcasters are constantly assessing the interests and needs in their communities in order to give audiences what they cannot find elsewhere. This ascertainment comes in many forms – and is pursued by broadcasters, both large and small, commercial and noncommercial. Examples abound.

Many stations report regularly scheduled meetings with local elected and appointed officials to assist in taking the pulse of their communities. Some conduct formal or ad-hoc listener surveys. In a number of instances, station managers and other personnel sit on various boards, committees, councils and commissions. This is especially true in more sparsely-populated areas where community functions depend on community participation in often voluntary public efforts.

Internet-based community feedback is also a useful tool for many stations in this vast state. KINY, Juneau, specifically encourages such listener feedback to ascertain community needs and interests. The station also regularly interviews business and government leaders in the Southeastern part of the state as part of a daily public affairs

programming block. Listeners are also given air time in a daily “Problem Corner” program in which they are encouraged to discuss issues that affect the community.

Many stations, especially public radio stations, have established community advisory boards. The public radio stations, KBBI and KDLL, in Homer, include a survey in the winter program guide as way to gauge listener concerns. KCAW in Sitka provides a listener feedback line for regular contact with the community. Both of these public radio operations also have active volunteer programs through which members of the community can have a direct impact on programming by actually producing it.

The “local” in local broadcasting is what distinguishes free over-the-air broadcasters from their competitors. It is their duty. It also makes good business sense. Ascertaining what local communities want and need is part of that business imperative – and local broadcasters are doing what is necessary to compete with a multitude of media options that did not exist a generation or, in some instances, even a decade ago. Quite simply, if local broadcasters were not locally connected, they would lose audience.

Local News and Public Affairs Programming Represents a Core Value; Providing Emergency Information is Significant to this Commitment

As the centerpoint of a community’s communications, a local broadcaster provides local news, information, and public affairs. Depending on format or community served, the state’s broadcasters provide different levels of news and public affairs programming, but when the public needs to know, the state’s broadcasters stand ready to provide that knowledge. This is especially important in a vast and sparsely populated state, such as Alaska, that often experiences extreme weather. Urgent information on

man-made disasters, such as oil spills, are also an important service provided by Alaska's broadcasters.

Not only during crises, but also in every day broadcasts, Alaska's broadcasters regard localism as a central part of their mission. This commitment is clearly reflected in programming.

KINY, for example, provides regular local newscasts, as well as two daily public affairs programs – one that features interviews with business and political leaders, and another that serves as an open-mike forum for members of the community.

The state's public radio stations provide award-winning local and state news. Stations also provide information services that are unique to Alaska. KBBI and KDLL, for instance, broadcast messages to Alaskans living in the bush who have no access to telephones. Some stations also provide such services as job listings, ride share information and similar information; in many areas of the state, radio is the primary, and in some cases, the only source of news and information.

In the state's few metropolitan areas, which have more media access than isolated towns and bush communities, not every station attempts to market itself as all things to all people. While, in the more remote areas that make up the vast majority of the state, radio is essential business. Wherever located, local broadcasters still remain at the centerpoint of a community – not because of mandates, but because it is good business.

Beyond EAS: Emergency Information to Protect Life and Property

Emergency Alerts are important, but Alaska's broadcasters go beyond mere compliance with the EAS rules. In times of local need and/or crisis, listeners turn to local broadcasters to keep them updated on protecting life and property – and broadcasters all

over the state break away from normal programming to provide what only a local broadcast service can: localized information. As noted, local stations serving as a community's communications centerpoint provide such information as a matter of course. People rely and regularly tune into their local broadcasters to help them steer clear of trouble, expecting to be informed of what is most immediately relevant and important. Many stations hold regular meetings with local first response officials to ensure that when trouble strikes, the public will be informed quickly and accurately –with greater speed or depth than is provided through mere EAS compliance. Some, such as KCAW, have a staff member that is part of the local emergency planning commission because broadcasters are at the heart of emergency communications with the public in this state.

Community Service Is an Important Element of the Broadcast Industry's Business

A survey, conducted as part of a national project,³ found that Alaska broadcasters contributed about 22 million dollars worth of service to their communities in 2003. This included the broadcast of public service announcements ("PSAs"), direct fundraising efforts for charitable projects, and other direct or in-kind donations. Broadcast stations have often played a major role, from their perches at the centerpoint of community life, to garner assistance for victims of local disasters.

Broadcast stations have also been a lynchpin in public awareness campaigns concerning a host of issues from AIDS to poverty. A copy of the Alaska Public Affairs Summary describing these efforts is attached hereto as Exhibit A.

³ The survey was conducted by Public Opinion Strategies of Alexandria, Virginia, for the National Association of Broadcasters, in cooperation with the Alaska Broadcasters Association.

All over the state, broadcasters donate spot time for local charities and civic groups, as well as provide information about various community activities through community bulletin board spots and features. For instance, KINY directly sponsors the local Salvation Army holiday toy drive, a walk to raise money for breast cancer, and a litter-free community clean-up day.

The reality is that Alaska's broadcasters are doing good and, in the process, doing well by cementing relationships with their communities.

Broadcasters Serve Minorities Together with their Communities' Majorities

In the state's few metropolitan areas, broadcasters serve both niche markets and the broader community. Some do it through programming, others through news and public affairs, and others still through public service. Even in smaller markets serving isolated or bush communities, – where few stations operate – broadcasters reach out to minorities.

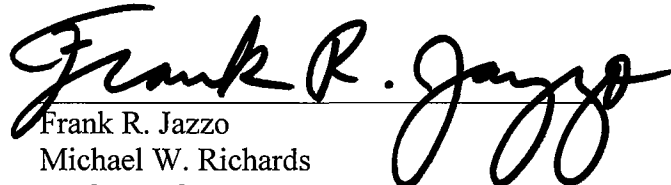
Alaska's unique cultural mosaic is reflected in its broadcasting. KNBA in Anchorage is the largest urban station in the country with a Native American program format. KIYU in Galena broadcasts an "Athabaskan Hour" in English and Athabaskan dialect.

Conclusion

Alaska's local broadcasters respond to the need for localism in their broadcasting activities first, because it is the right thing to do, and also because it makes good business sense in the multichannel, multimedia universe. It is their sense of place and their connections to their communities that give them a distinctive edge in their competition

with electronic mass media delivered by other means. The Commission need not intercede because broadcasters have long been a communications centerpoint in their communities, and marketplace realities keep localism as an imperative for broadcast stations.

Respectfully submitted,
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EXHIBIT A

Alaska Public Affairs Summary

Introduction

Broadcasters have a mandate to serve the public interest of the communities in which they operate. Given the diversity of communities in the United States, there is a multitude of needs which could be and are addressed over the public airwaves by broadcasters. Indeed, broadcasters are recognizably in a very unique position – every station in the country is a local station and very much a part of the community it is licensed to serve.

Public affairs activities are an integral part of broadcast stations' community involvement. Through public affairs activities, stations help increase awareness of issues that affect their audiences. Radio and television broadcasters invest both programming and non-programming time and efforts to educate and involve their communities. Programming activities include, but are not limited to, public service announcements wherein stations donate valuable commercial time for messages alerting the public about health threats and other issues. Stations also produce public affairs programs featuring in-depth discussions of problems and remedies. In addition to these programming efforts, broadcasters initiate or are involved in many activities and community groups aimed at educating and involving their communities.

While the ways in which broadcasters are involved in their communities may seem similar, every local broadcaster's efforts are different. Public service campaigns undertaken by stations nationwide integrate on-air and off-air efforts. Additionally, since each station cannot address every need of its given community as its top priority, stations each focus on different needs, thus addressing overall the diversity of issues within a community. In any given community, the local broadcasters' unique responses and approaches to the diversity of issues is also supplemented by major national efforts.

Our state association, in partnership with the National Association of Broadcasters, conducted a survey of television and radio stations in Alaska to determine the extent of station participation in public affairs activities. A variety of methodologies were employed to reach stations – with mail, fax, and Internet surveys sent out between January and April 2004. The response rate of Alaska broadcasters was 53%, as 4 of the 10 commercial television stations licensed to the state (40%) are represented in the data, as are 37 of the 68 radio stations (54%).

The census revealed that Alaska radio and television stations contributed approximately 22 million dollars worth of service to their communities during 2003. The data were collected, tabulated and analyzed by Public Opinion Strategies, an Alexandria, Virginia-based opinion research firm.

Donating Time, Raising Money, and Responding to Community Needs

- ✓ Using mean figures to derive a per-station total, responding Alaska TV stations report running approximately 196 PSAs per week, with radio stations running 92. These figures combine all PSA spot times – from ten seconds or less up to 60 second PSAs. Using the reported rate charged for each of these spot lengths, these PSAs translate into a mean cumulative amount of \$479,076 a year per TV station responding, and \$127,712 per radio station responding.

The cumulative statewide totals based on these data show the total PSA value for Alaska TV stations as \$4,790,760 and \$8,684,416 for radio stations.

- ✓ Fully three-quarters of responding TV stations (75%) and almost all responding radio stations (95%) say they help charities, charitable causes or needy individuals by fundraising or offering some other support. The mean amount raised by these TV stations was \$1,001,800, with responding radio stations reporting a mean of \$18,507. The projected cumulative amounts for this charitable giving is \$7,513,500 for TV stations and \$1,195,552 for radio stations who conducted some fundraising during the time period examined.

The charitable amount raised by responding TV stations ranged from \$3,600 up to \$2,000,000, with a range among radio stations of \$800 to \$60,000.

- ✓ Four-in-ten (40%) responding Alaska broadcast stations were involved in either on-air campaigns – either through local news broadcasts, PSAs, or public affairs programming – or off-air activities to aid the victims of disasters.

As one of the results of these efforts, broadcasters in the state reported raising over \$54,000 in direct contributions or pledges related to disaster relief during 2003.

- ✓ PSAs also focus on local issues. Among responding TV stations, respondents say that an average of 23% of PSA time is devoted to local issues; the percentage of PSAs devoted to local issues among responding radio stations was 69%.

Broadcasters Addressing Important Topics

- ✓ The following table examines some specific issues and the response by responding stations. As in previous years, broadcasters continue to devote time and resources to addressing important and relevant topics.

Each respondent was asked to respond whether their station aired PSAs, locally produced public affairs programs/segments (not including news broadcasts), or news segments on each of the following topic areas. The numbers here are the percentages of all state TV and radio stations who say they have addressed a particular topic through one of those methods:

| Issue | TV | | | Radio | | |
|------------------------------------|------|------------|--------------|-------|------------|--------------|
| | PSA | PA Program | News Segment | PSA | PA Program | News Segment |
| AIDS | 25% | 25% | 50% | 78% | 11% | 49% |
| Alcohol abuse | 100% | -- | 50% | 95% | 57% | 59% |
| Adult educ./literacy | 75% | 50% | -- | 95% | 51% | 59% |
| Anti-crime | 75% | 50% | 50% | 76% | 43% | 65% |
| Anti-smoking | 75% | 50% | 25% | 86% | 32% | 46% |
| Anti-violence | 100% | 75% | 50% | 89% | 51% | 57% |
| Breast cancer/other women's health | 100% | 50% | 50% | 92% | 41% | 51% |
| Children's issues | 100% | 75% | 50% | 92% | 49% | 59% |
| Drinking during pregnancy | 100% | -- | 25% | 86% | 41% | 41% |
| Drunk driving | 100% | 25% | 25% | 100% | 46% | 65% |
| Drug use/abuse | 100% | 75% | 50% | 100% | 19% | 65% |
| Homeland security issues | 100% | 25% | 50% | 65% | 24% | 59% |
| Hunger/poverty/homelessness | 100% | 25% | 50% | 73% | 51% | 41% |
| Fund raising drives | 100% | 50% | 50% | 86% | 65% | 59% |

Promoting Participation

- ✓ Fully 53% of responding Alaska broadcast stations report airing public affairs programs of at least 30 minutes in length.
- ✓ The leading topics of public service campaigns by Alaska broadcasters in 2003 included drunk driving and alcoholism, supporting local charities, national charities (such as Easter Seals, Goodwill, etc.), reading and literacy, armed forces, and children's issues. Some primary recipients included the Children's Hospital at Providence, American Heart Association, Salvation Army, Food Bank of Alaska, and The United Way.

Methodology Notes

Continuing our participation on this project with the National Association of Broadcasters, a number of continued refinements were made from 2001, including the addition of issues such as anti-smoking and homeland security matters as possible topics for news segments, public affairs programming, and PSAs. Market size and revenue data for stations was linked to survey data, allowing for more precise weighting and sample procedures.